



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 30, 2017

By FedEx and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, some of which has been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the "February 22 Order"). This disclosure supplements the government's earlier disclosures under cover of letters dated February 15, 2017, May 22, 2017, May 24, 2017, June 12, 2017, July 12, 2017, and July 24, 2017. The government renews its request for reciprocal discovery from the defendant.

Enclosed are the following:

- Documents seized from Eric Crain on or about November 10, 2016, (DZ062834-DZ062837);
- An inventory of materials seized from the search of the premises located at Pavonia Avenue in Jersey City, New Jersey, which has been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062838-DZ062846);

- An inventory of materials seized from the search of the premises located at Summit Avenue in Jersey City, New Jersey, which has been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062847-DZ062849);
- A photographic log of the search from the premises located at Pavonia Avenue in Jersey City, New Jersey, which has been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062850-DZ062852);
- The search warrant and supporting affidavit for the search of a premises located at Wayne Street in Jersey City, New Jersey, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062853-DZ062857);
- Photographs taken during the search of a premises located at Wayne Street in Jersey City, New Jersey, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062858);
- Redacted search warrants relating to previously-provided search warrant affidavits, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062859-DZ062891);
- A draft translation of an email, which was been designated Sensitive Discovery Material pursuant to the February 22 Order and which is produced pursuant to the terms of the June 13, 2017 Stipulation regarding draft transcriptions and translations (DZ062892-DZ062894); and
- A reproduction in more legible format of materials previously produced as DZ002711-DZ002716 (DZ062895-DZ062900).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

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Enclosures (DZ062834-DZ062900)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)